



# **COUNTY OF ORANGE**

## **RESOURCES & DEVELOPMENT MANAGEMENT DEPARTMENT**

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Ms. Shahla Farahnak  
State Water Resources Control Board  
Division of Financial Assistance  
1001 I Street, 16<sup>th</sup> Floor  
Sacramento, CA 95814

Ms. Tracie Billington  
Department of Water Resources  
Division of Planning and Local Assistance  
P.O. Box 942836  
Sacramento, CA 94236-0001

Re: Public Input on Draft Funding Recommendations, First Round Prop 50, Chapter 8

Dear Misses Farahnak and Billington:

Thank you for the opportunity to submit comments on the Draft Funding Recommendations for the first round of Proposition 50, Chapter 8 funding. The County of Orange, as lead agency for the South Orange County Integrated Regional Water Management (IRWM) Group, is very pleased to have been ranked among the top submittals and thus included in the Draft Funding Recommendations. We commend both the Department of Water Resources (DWR) and the State Water Resources Control Board (SWRCB) staff for validating our program and making this a fair process for all regions, small or large, in all of their diversity.

### Process

The IRWM grant program provided an effective incentive for bringing together the water agencies, special districts, cities, and the County of Orange to prepare an IRWM Plan for South Orange County. This process brought partners together who had previously not had the opportunity to work collectively. The end result is a cohesive group that was able to prepare an integrated regional strategy for management of water resources that will protect our region from drought, protect and improve water quality, and improve local water security.

We feel that the process was a positive experience, reinforced by the helpful staff representing both the DWR and SWRCB.

## Plan

The South Orange County IRWM Plan is an excellent example of utilizing existing plans and research documents to serve as the framework for the IRWM Plan. The South County participants cooperated to an unprecedented degree in developing regional concepts to build on that framework, and prioritized all of the actions described in the plan across activity types. We felt that the weighted IRWM Plan score of 26 (out of 30) demonstrates that the South Orange County IRWM Plan fully meets the standards as outlined in the grant program guidelines.

## Grant Application

We feel that the proposal score of 86 is fair, although we would like to make clarifications on a few of the criteria:

### Economic Analysis

The Economic Analysis exercise proved to be challenging for most applicants. Although we attended two workshops and spent many hours discussing the issue with DWR and SWRCB staff, we still struggled with this component. Although we may not have been able to express this information as clearly as we would have liked, we are confident that the water supply and water quality benefits to the region are substantial. We learned from the process and will be able to communicate more clearly about our analysis in the next round.

### Other Expected Benefits

The ecological benefits that this program will bring to our region go far beyond what was described in the proposal. Each project selected for inclusion in the grant application was multi-beneficial. We were conservative in our approach to addressing the Other Expected Benefits, as we wanted to remain confident that we would be able to provide each of the benefits stated.

### Statewide Priorities

Because of the weight assigned to this attachment, it would be helpful in the next round to increase the page limit from 10 to 15 pages. We feel that we fully addressed each Statewide Priority and tied the relevant projects to each priority. We are confident that the TMDL and Water Quality Objectives discussed in our proposal have a high level of certainty and include efforts to achieve reductions of TMDLs in the region.

## Closing Comments

The County supports issuing additional grants in this round, if the applicants have an adopted plan, scored close to the selected range, and are ready to proceed. We would

like to advocate that our neighbor, the Santa Ana Watershed Project Authority (SAWPA), be considered for addition to the Draft Funding Recommendations. We offer this suggestion because we have had the opportunity to participate in the SAWPA process with regard to northern Orange County, and we believe the process and the plan it produced were exemplary. In addition, SAWPA was very helpful to our group by sharing ideas and offering advice as we were navigating our way through the process. They did not have to do this, but it certainly helped immensely.

The South Orange County IRWM Group is currently discussing strategies to position itself to receive Proposition 84 and Measure M (Orange County's Transportation Sales Tax) funds for projects not funded through the Proposition 50, Chapter 8 program. We will continue to partner and identify additional Federal, state and local funding sources for regional projects that protect water supply and provide water quality benefits to Californians and our visitors.

We look forward to working with SWRCB staff on our Proposition 50, Chapter 8 funding program!

Sincerely,

Larry B. McKenney  
Director  
Watershed and Coastal Resources